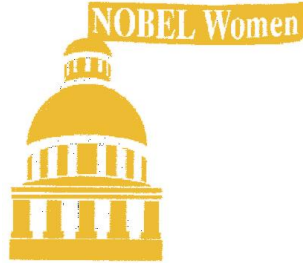


*National Organization
Of
Black Elected Legislative Women*



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Federal Communications Commission
Washington, DC 20554

ATTN: Hon. Julius Genachowski, Chairman
Commissioner Mignon Clyburn
Commissioner Robert McDowell
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel

April 30, 2013

Dear Chairman Genachowski and Commissioners:

On behalf of the National Organization of Black Elected Legislative Women (NOBEL Women), whose 223 members serve in the legislatures for a range of states, territories and the District of Columbia, I am writing to express our concern regarding the state of the minority broadcast industry. The number of minority broadcasters – who own only a small percentage of television and radio stations – has been declining for more than a decade. We believe this statistic reflects a bigger problem – one that is directly linked to the Commission's foreign broadcast investment policies.

As research has indicated over the last several years, the primary cause for the decline in minority ownership within the broadcast industry is a lack of access to capital. In addition, the majority of minority-owned stations are small, and they tend to operate on inferior frequencies in comparison to their mainstream competition.

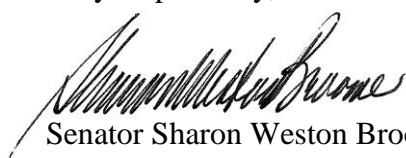
Since minority-owned broadcast companies help enrich our nation's discourse and provide a much needed and balanced diverse perspective to consumers, we cannot continue to overlook the support that this industry segment needs. Their contributions are crucial to the nation's cohesiveness, and this is why we hope that the Commission will consider relaxing its foreign ownership policies.

Current policies regarding foreign investments in broadcasting are not aligned with today's business expectations. The Commission has applied 310(b)(4) of the Communications Act so as to prohibit foreign investors from owning more than a 25 percent stake in a broadcast station. By arbitrarily capping foreign investment, we are prohibiting investors from fully engaging with our broadcast industry. Furthermore, we are prohibiting minority owned companies from gaining access to much needed capital that would help improve minority broadcast ownership and would help stimulate our economy.

Foreign broadcast investment is key for industry growth and for the sustainability of minority ownership. Therefore, we at NOBEL Women ask that the Commission relax its restrictions regarding foreign ownership policies and procedures, ensuring that broadcast providers – big and small, minority and women owned – have access to capital that will allow them to continue contributing to the nation's diverse audiences.

We thank you for your consideration of this matter.

Very respectfully,

A handwritten signature in black ink, appearing to read "Sharon Weston Broome", written in a cursive style.

Senator Sharon Weston Broome
National President

National Organization of Black Elected Legislative Women